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PARADIGM OPERATIONS LP

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMANDA HOUGHTON, CHARLES
DOUGLAS, and SUSAN FRANKLIN, on
behalf of all others similarly situated,

Plaintiffs,

v.

COMPOUND DAO, a California general
partnership; ROBERT LESHNER;
GEOFFREY HAYES; AH CAPITAL
MANAGEMENT, LLC; POLYCHAIN
ALCHEMY, LLC; BAIN CAPITAL
VENTURES (GP); GAUNTLET
NETWORKS, INC; PARADIGM
OPERATIONS LP,

Defendants.

CASE NO.: 3:22-cv-07781-WHO

Judge: Hon. William H. Orrick III
Complaint Filed: December 8, 2022

**JOINT STIPULATION AND
[PROPOSED] ORDER (1) SETTING A
DEADLINE FOR FILING AN
AMENDED COMPLAINT (2) SETTING
A BRIEFING SCHEDULE FOR ANY
MOTIONS TO DISMISS AND
(3) CONTINUING THE CASE
MANAGEMENT CONFERENCE**

1 Plaintiffs Amanda Houghton, Charles Douglas, and Susan Franklin, individually and on
 2 behalf of all others similarly situated ("Plaintiffs"), and Defendants Robert Leshner, Geoffrey Hayes,
 3 AH Capital Management, LLC, Polychain Alchemy, LLC, Bain Capital Ventures (GP), Gauntlet
 4 Networks, Inc., and Paradigm Operations LP ("Defendants" and, with Plaintiffs, the "Parties")
 5 hereby stipulate and agree as follows:

6 **WHEREAS**, on December 8, 2022, Plaintiffs filed the complaint in the above-captioned
 7 action ("Action"), a putative class action arising under Sections 5 and 12(a)(1) of the Securities Act
 8 of 1933 ("Securities Act"), including the Private Securities Litigation Reform Act of 1995
 9 ("PLSRA"), 15 U.S.C. § 78u-4, against Compound DAO and Defendants;

10 **WHEREAS**, on December 9, 2022, the Court entered an Order setting an Initial Case
 11 Management Conference ("CMC") for March 14, 2023 (ECF 9);

12 **WHEREAS**, on December 29, 2022, the Court issued an Order: (i) that no Defendant was
 13 required to respond to the previously filed complaint; (ii) vacating the Court-mandated ADR Multi-
 14 Option program deadlines, to be reset to a date after the Court rules on any motions to dismiss the
 15 amended complaint in the Action; (iii) vacating the March 14, 2023 CMC to be rescheduled to a date
 16 of the Court's choosing after it rules on any motions to dismiss the amended complaint or any other
 17 motions to dismiss that may be subsequently filed; and (iv) directing the Parties to meet and confer
 18 and, within 14 days of the Court's order on the then-forthcoming lead plaintiff motions, jointly submit
 19 a proposed schedule regarding the filing of an amended complaint, Defendants' response thereto, and
 20 all associated briefing (ECF 30);

21 **WHEREAS**, on March 13, 2023, the Court issued an Order appointing Plaintiffs as lead
 22 plaintiffs and approving Plaintiffs' selection of Gerstein Harrow LLP and Fairmark Partners LLP as
 23 lead counsel (ECF 73 (the "Lead Plaintiff Order"));

24 **WHEREAS**, in connection with the Lead Plaintiff Order, the Court also set a CMC for
 25 April 11, 2023 at 2:00 p.m., with a corresponding Case Management Conference Statement due on
 26 April 4, 2023;

27 **WHEREAS**, under the PSLRA, "all discovery and other proceedings shall be stayed during
 28

1 the pendency of any motion to dismiss," 15 U.S.C. § 78u-4(b)(3)(B); and

2 **WHEREAS**, the Parties agree that, in light of the PSLRA's requirements, and in the interests
3 of judicial economy, conservation of time and resources, and orderly management of this Action, the
4 Case Management Conference and all associated deadlines should be continued until the Court rules
5 on any motions to dismiss the forthcoming amended complaint or any other motions to dismiss that
6 may be subsequently filed;

7 **THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, pursuant to Civil Local
8 Rules 6-1(b), 6-2 and 7-12, by and between the undersigned counsel for the undersigned parties,
9 subject to Court approval, as follows:

10 1. Plaintiffs shall file any amended complaint by March 31, 2023.

11 2. The time for any properly served Defendant to answer, move, or otherwise respond
12 to the amended complaint, including bringing any motion pursuant to Federal Rule of Civil
13 Procedure 12, shall be 42 days from the filing of Plaintiffs' amended complaint.

14 3. The time for Plaintiffs to oppose any motion filed pursuant to Federal Rule of Civil
15 Procedure 12 shall be 42 days from the filing of that motion.

16 4. Reply papers, if any, in support of a motion filed pursuant to Federal Rule of Civil
17 Procedure 12 shall be filed within 28 days of the filing of Plaintiffs' opposition to that motion.

18 5. The Case Management Conference currently scheduled for April 11, 2023 at
19 2:00 p.m. and the associated ADR deadlines shall be vacated and rescheduled to a date of the Court's
20 choosing after it rules on any motion to dismiss the amended complaint or any other motion to
21 dismiss that may be subsequently filed.

22 6. Nothing herein shall be deemed to constitute a waiver of any rights, defenses,
23 objections or any other application to any court that any party may have with respect to the claims
24 set forth in the complaint or any amended complaint filed in this Action.

1 DATED: March 27, 2023

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2
3 /s/ Jason Harrow

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Attorneys for Defendant Paradigm Operations LP

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: _____, 2023

By: _____

HONORABLE WILLIAM H. ORRICK III
UNITED STATES DISTRICT JUDGE

FILER'S ATTESTATION

I, Peter B. Morrison, am the ECF User whose ID and password are being used to file this Joint Stipulation (1) Setting A Deadline For Filing An Amended Complaint (2) Setting A Briefing Schedule For Any Motions To Dismiss And (3) Continuing The Case Management Conference. In compliance with Civil Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document have been obtained from each of the other signatories.

By: /s/ Peter B. Morrison
Peter B. Morrison